

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES
MANAGEMENT DIVISION**

**Design Printing Company, Inc.
626 North Illinois Street
Indianapolis, Indiana 46204**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-12399-00191	
Issued by: Daniel B. Dovenbarger Administrator, ERMD City of Indianapolis	Issuance Date: Expiration Date:

SECTION A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-8-3(b)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
- A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]
- A.4 FESOP Applicability [326 IAC 2-8-2]
- A.5 Prior Permit Conditions

SECTION B GENERAL CONDITIONS

- B.1 Permit No Defense [IC 13]
- B.2 Definitions [326 IAC 2-8-1]
- B.3 Permit Term [326 IAC 2-8-4(2)]
- B.4 Enforceability [326 IAC 2-8-6]
- B.5 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3 (h)]
- B.6 Severability [326 IAC 2-8-4(4)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]
- B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]
- B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]
- B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]
- B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
- B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]
- B.14 Emergency Provisions [326 IAC 2-8-12]
- B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.17 Permit Renewal [326 IAC 2-8-3(h)]
- B.18 Permit Amendment or Modification [326 IAC 2-8-10][326 IAC 2-8-11.1]
- B.19 Operational Flexibility [326 IAC 2-8-15]
- B.20 Permit Revision Requirement [326 IAC 2-8-11.1]
- B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [I13-14-2-2]
- B.22 Transfer of Ownership or Operation [326 IAC 2-8-10]
- B.23 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

SECTION C SOURCE OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- C.1 Overall Source Limit [326 IAC 2-8]
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1][IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

Testing Requirements [326 IAC 2-8-4(3)]

- C.8 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]

- C.9 Compliance Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.11 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
- C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

- C.14 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]
- C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
- C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS Six (6) Heidelberg Printing Presses

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6][326 IAC 2-7-2]
- D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.3 Volatile Organic Compounds (VOC)

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.1.4 Record Keeping Requirements
- D.1.5 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS Anti Offset Powders

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.2.1 326 IAC 6-3-2 Particulate Emission Limitations [326 IAC 6-3-2]

Certification Form

Emergency Occurrence Report

Fesop Quarterly Report Form for Individual VOC Emissions EU2

Fesop Quarterly Report Form for Individual VOC Emissions EU9

Fesop Quarterly Report Form for Source wide VOC Emissions

Fesop Quarterly Deviation and Compliance Monitoring Report

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis Environmental Resources Management Division (ERMD). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary printing operation that produces graphic art.

Authorized individual:	Gregory King
Source Address:	626 North Illinois Street, Indianapolis, IN. 46204
Mailing Address:	626 North Illinois Street, Indianapolis, IN. 46204
SIC Code:	2752
Source Location Status:	Marion County
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD or Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Heidelberg Printing Press, model number CD 102 S&L, identified as EU1, with a maximum capacity of 11.23 MMin² (million square inches) per hour, using no controls, and exhausting to stack 1.
- (b) Heidelberg Printing Press, model number CD 102 S&L, identified as EU2, with a maximum capacity of 11.23 MMin² (million square inches) per hour, using no controls, and exhausting to stack 1.
- (c) Heidelberg Printing Press, model number SORSZ, identified as EU5, with a maximum capacity of 12.96 MMin² (million square inches) per hour, using no controls, and exhausting inside the building.
- (d) Heidelberg Printing Press, model number GTOZ52+, identified as EU6, with a maximum capacity of 2.25 MMin² (million square inches) per hour, using no controls, and exhausting inside the building.
- (e) Heidelberg Printing Press, model number SM74 6P&L, identified as EU8, with a maximum capacity of 9.56 MMin² (million square inches) per hour, using no controls, and exhausting to stack 1.
- (f) Heidelberg Printing Press, model number SM102 8P5+, identified as EU9, with a maximum capacity of 14.544 MMin² (million square inches) per hour, using no controls, and exhausting to stack 1.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

- a) Bindery Department is classified as an insignificant emitting activity based on the following information. The Potential emissions for this area was based on an extrapolation of actual usage data to reflect continuous hours of operation. The potential emissions for this area was established at 0.41 tons of VOC per year or 2.23 pounds of VOC per day.
- b) Prepress Area is classified as an insignificant emitting activity based on the following information. The Potential emissions for this area was based on extrapolation of actual usage data to reflect continuous hours of operation. The potential emissions for this area was established at 1.02 tons for all HAPs combined, 0.40 tons Hexane (highest single HAP), 13.92 pounds of VOC per day.
- c) Particulate emissions from the use of anti offset powders at the presses was classified as an insignificant emitting activity based on the following information. The Potential emissions of particulate matter was from each press was based on maximum usage of anti offset powder and continuous hours of operation. The potential emissions of particulate matter for each press was established at 4.16 pounds per day for all emitting units combined.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, and ERMD shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

(a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and ERMD, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by and ERMD.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)][326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division, Permits
Air Quality Management Section

2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, and ERMD within a reasonable time, any information that IDEM, OAQ, and ERMD may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ and ERMD may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal, requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit,

including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15th of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and ERMD on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and ERMD may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division, Compliance
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and ERMD upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and ERMD. IDEM, OAQ, and ERMD may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner and/or ERMD makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner and/or ERMD within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and ERMD, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

ERMD
Telephone No.: 317/327-2234
Facsimile No.: 317/327-2274

Failure to notify IDEM, OAQ and ERMD, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ and ERMD, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ and ERMD, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee’s failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ or ERMD determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ or ERMD, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ or ERMD, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or ERMD, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ or ERMD and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does

require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

Environmental Resource Management Division, Permits
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and ERMD on or before the date it is due.

(2) If IDEM, OAQ and ERMD upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and ERMD takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and ERMD, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division, Permits
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and ERMD, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC-13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, and ERMD U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
 - (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
 - (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
- [326 IAC 2-8-5(a)(4)]

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division, Permits
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The application which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, and ERMD, within thirty (30) calendar days of receipt of a billing pursuant to 326 IAC 2-7-19(b). If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the

property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment is are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division, Asbestos
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division, Compliance
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and ERMD not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and ERMD, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in

accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for new emission units, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]

[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.14 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and ERMD on or before the date it is due.

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner and/or ERMD makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner and/or ERMD within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and ERMD on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and

emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) Heidelberg Printing Press, model number CD 102 S&L, identified as EU1, with a maximum capacity of 11.23 MMin² (million square inches) per hour, using no controls, and exhausting to stack 1.
- (b) Heidelberg Printing Press, model number CD 102 S&L, identified as EU2, with a maximum capacity of 11.23 MMin² (million square inches) per hour, using no controls, and exhausting to stack 1.
- (c) Heidelberg Printing Press, model number SORSZ, identified as EU5, with a maximum capacity of 12.96 MMin² (million square inches) per hour, using no controls, and exhausting inside the building.
- (d) Heidelberg Printing Press, model number GTOZ52+, identified as EU6, with a maximum capacity of 2.25 MMin² (million square inches) per hour, using no controls, and exhausting inside the building.
- (e) Heidelberg Printing Press, model number SM74 6P&L, identified as EU8, with a maximum capacity of 9.56 MMin² (million square inches) per hour, using no controls, and exhausting to stack 1.
- (f) Heidelberg Printing Press, model number SM102 8P5+, identified as EU9, with a maximum capacity of 14.544 MMin² (million square inches) per hour, using no controls, and exhausting to stack 1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOCs)[326 IAC 8][326 IAC 2-7-2]

The VOC usage of each emitting unit with a potential to emit greater than 25 tons per year of VOC and which are not covered by any other provisions of 326 IAC 8, (EU2, EU9) shall be limited as specified below. The total VOC usage of all emitting units (EU1, EU2, EU5, EU6, EU8, and EU9) shall be limited to less than 97.05 tons per rolling 12 month consecutive period so that the source-wide VOC emissions shall not exceed 100 tons per year, such that the Part 70 Operating Permit Regulation 326 IAC 2-7-2 shall not apply.

- (a) The Volatile Organic Compound usage from emitting unit EU2 shall be less than 25 tons per rolling 12 month consecutive period so that the VOC emissions for each individual emitting unit that has the potential to emit more than 25 tons per year of VOCs do not equal or exceed 25 tons per year, and therefore, the best available control technology (BACT) requirements in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) do not apply.
- (b) The Volatile Organic Compound usage from emitting unit EU9 shall be less than 25 tons per rolling 12 month consecutive period so that the VOC emissions for each individual emitting unit that has the potential to emit more than 25 tons per year of VOCs do not equal or exceed 25 tons per year, and therefore, the best available control technology (BACT) requirements in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) do not apply.

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU1, EU2, EU5, EU6, EU8, EU9.

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds (VOC)

- (a) Compliance with the VOC usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, and ERMD reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent month.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.4 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

Specifically regulated insignificant activity:

Particulate emissions from the use of anti offset powders at the presses

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

326 IAC 6-3-2 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the use of anti offset powders at the presses shall be limited by the following:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The process weight rate per hour of the use of anti offset powders is less than 100 lbs/hour, therefore the rate of emission is limited to 0.551 lbs/hour. The potential emissions from the use of anti offset powders is 4.16 lbs/day, which is 0.17 lbs/hour, much less than the established limit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Design Printing Co., Inc.
Source Address: 626 North Illinois Street
Indianapolis, In. 46204
Mailing Address: 626 North Illinois Street
Indianapolis, In. 46204
FESOP No.: 097-12399-00191

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967
CITY OF INDIANAPOLIS - ENVIRONMENTAL RESOURCES MANAGEMENT
DIVISION
DATA COMPLIANCE
2700 South Belmont Avenue
Indianapolis, Indiana 46221
Phone: 317-327-2234
Fax: 317-327-2274
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Design Printing Co., Inc.
Source Address: 626 North Illinois Street
Indianapolis, In. 46204
Mailing Address: 626 North Illinois Street
Indianapolis, In. 46204
FESOP No.: 097-12399-00191

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
FESOP Quarterly Report**

Source Name: Design Printing Co., Inc.
Source Address: 626 North Illinois Street
Indianapolis, In. 46204
Mailing Address: 626 North Illinois Street
Indianapolis, In. 46204
FESOP No.: 097-12399-00191
Facility: EU2
Parameter: Individual VOC Emissions
Limit: Less than 25 tons per rolling consecutive 12 month period

Quarter_____Year_____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
FESOP Quarterly Report**

Source Name: Design Printing Co., Inc.
Source Address: 626 North Illinois Street
Indianapolis, In. 46204
Mailing Address: 626 North Illinois Street
Indianapolis, In. 46204
FESOP No.: 097-12399-00191
Facility: EU9
Parameter: Individual VOC Emissions
Limit: Less than 25 tons per rolling consecutive 12 month period

Quarter _____ Year _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
FESOP Quarterly Report**

Source Name: Design Printing Co., Inc.
Source Address: 626 North Illinois Street
Indianapolis, In. 46204
Mailing Address: 626 North Illinois Street
Indianapolis, In. 46204
FESOP No.: 097-12399-00191
Facility: EU1, EU2, EU5, EU6, EU8, and EU9
Parameter: Combined VOC Emissions
Limit: Less than 97.05 tons per rolling consecutive 12 month period

Quarter		Year	
Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Design Printing Co., Inc.
Source Address: 626 North Illinois Street
Indianapolis, In. 46204
Mailing Address: 626 North Illinois Street
Indianapolis, In. 46204
FESOP No.: 097-12399-00191
Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report

**Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Environmental Resources Management Division**

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit
(FESOP)

Source Name:	Design Printing Co., Inc.
Source Location:	626 North Illinois Street, Indianapolis, IN. 46204
County:	Marion
SIC Code:	2752
Operation Permit No.:	F097-12399-00191
Permit Reviewer:	Dana Armstrong

On April 11, 2001, the City of Indianapolis Environmental Resources Management Division (ERMD) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Design Printing Co., Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a stationary printing operation. The notice also stated that OAQ and ERMD proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On May 03, 2001, ERMD received comments from Design Printing on the proposed FESOP. The summary of the comments is as follows:

Comment 1:

In the equipment description in Section A.2(e), the model number SL674 6P&L should read SM74 6P&L

Response to Comment 1:

Equipment description will be changed in Section A and in the facility description in Section D.1.

Comment 2:

In the equipment description in Section A.2(f), the model number SM102 P&L should read SM102 8P5+

Response to Comment 2:

Equipment description will be changed in Section A and in the facility description in Section D.1.

Comment 3:

Source commented that several other printing facilities were not required to submit a Preventative Maintenance Plan (PMP), and asked why they should be asked to do so.

Response to Comment 3:

A preventative maintenance plan is required pursuant to 326 IAC 2-8-3(c). Pursuant to OAQ policy, a PMP is required for any facility emitting PM10, SO2 or VOC and having a synthetic minor limit, and these lithographic presses are subject to a synthetic minor limit.

The following changes will be made to the proposed FESOP:

Condition A.2(e) Heidelberg Printing Press, model number ~~SL-674~~ **SM74** 6P&L, identified as EU8, with a maximum capacity of 9.56 MMin² (million square inches) per hour, using no controls, and exhausting to stack 1.

Condition A.2(f) Heidelberg Printing Press, model number SM102 ~~P&L~~ **8P5+**, identified as EU9, with a maximum capacity of 14.544 MMin² (million square inches) per hour, using no controls, and exhausting to stack 1.

Condition D.1 The following changes were made to the Facility Description box:

Facility Description [326 IAC 2-8-4(10)]:

- (a) Heidelberg Printing Press, model number CD 102 S&L, identified as EU1, with a maximum capacity of 11.23 MMin² (million square inches) per hour, using no controls, and exhausting to stack 1.
- (b) Heidelberg Printing Press, model number CD 102 S&L, identified as EU2, with a maximum capacity of 11.23 MMin² (million square inches) per hour, using no controls, and exhausting to stack 1.
- (c) Heidelberg Printing Press, model number SORSZ, identified as EU5, with a maximum capacity of 12.96 MMin² (million square inches) per hour, using no controls, and exhausting inside the building.
- (d) Heidelberg Printing Press, model number GTOZ52+, identified as EU6, with a maximum capacity of 2.25 MMin² (million square inches) per hour, using no controls, and exhausting inside the building.
- (e) Heidelberg Printing Press, model number ~~SL-674~~ **SM74** 6P&L, identified as EU8, with a maximum capacity of 9.56 MMin² (million square inches) per hour, using no controls, and exhausting to stack 1.
- (f) Heidelberg Printing Press, model number SM102 ~~P&L~~ **8P5+**, identified as EU9, with a maximum capacity of 14.544 MMin² (million square inches) per hour, using no controls, and exhausting to stack 1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Indiana Department of Environmental Management
Office of Air Quality
And
Environmental Resource Management Division (ERMD)
City of Indianapolis**

**Technical Support Document (TSD) for a Federally Enforceable State
Operating Permit (FESOP)**

Source Background and Description

Source Name:	Design Printing Co., Inc.
Source Location:	626 North Illinois Street, Indianapolis, IN. 46204
County:	Marion
SIC Code:	2752
Operation Permit No.:	F097-12399-00191
Permit Reviewer:	Dana Armstrong

The City of Indianapolis Environmental Resources Management Division (ERMD) and IDEM's Office of Air Quality (OAQ) has reviewed a FESOP application from Design Printing Co., Inc. relating to the operation of a stationary printing operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Heidelberg Printing Press, model number CD 102 S&L, identified as EU1, with a maximum capacity of 11.23 MMin² (million square inches) per hour, using no controls, and exhausting to stack 1.
- (b) Heidelberg Printing Press, model number CD 102 S&L, identified as EU2, with a maximum capacity of 11.23 MMin² (million square inches) per hour, using no controls, and exhausting to stack 1.
- (c) Heidelberg Printing Press, model number SORSZ, identified as EU5, with a maximum capacity of 12.96 MMin² (million square inches) per hour, using no controls, and exhausting inside the building.
- (d) Heidelberg Printing Press, model number GTOZ52+, identified as EU6, with a maximum capacity of 2.25 MMin² (million square inches) per hour, using no controls, and exhausting inside the building.
- (e) Heidelberg Printing Press, model number SM74 6P&L, identified as EU8, with a maximum capacity of 9.56 MMin² (million square inches) per hour, using no controls, and exhausting to stack 1.
- (f) Heidelberg Printing Press, model number SM102 8P5+, identified as EU9, with a maximum capacity of 14.544 MMin² (million square inches) per hour, using no controls, and exhausting to stack 1.

Insignificant Activities

- a) Bindery Department is classified as an insignificant emitting activity based on the

following information. The potential emissions for this area was based on an extrapolation of actual usage data to reflect continuous hours of operation. The potential emissions for this area was established at 0.41 tons of VOC per year or 2.23 pounds of VOC per day.

- b) Prepress Area is classified as an insignificant emitting activity based on the following information. The potential emissions for this area was based on extrapolation of actual usage data to reflect continuous hours of operation. The potential emissions for this area was established at 1.02 tons for all HAPs combined, 0.40 tons Hexane (highest single HAP), 13.92 pounds of VOC per day.
- c) Particulate emissions from the use of anti offset powders at the presses was classified as an insignificant emitting activity based on the following information. The Potential emissions of particulate matter was from each press was based on maximum usage of anti offset powder and continuous hours of operation. The potential emissions of particulate matter for each press was established at 4.16 pounds per day for all emitting units combined.

History

ERMD received a permit application for a FESOP from the source on January 25, 1996, and the source received FESOP # F097-5265-00191 on December 12, 1996. ERMD received a request from the source for it's permit to be changed to an SSOA on August 17, 1998, and the source received SSOA # S097-10042-00191 on October, 28, 1998. On June 19, 2000, ERMD received a request from the source for it's permit to be changed back to a FESOP, along with a FESOP permit application. This application was assigned the tracking number F097-12399-00191 by IDEM.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) F097-5265-0019, issued on January 25, 1996
- (b) S097-10042-00191, issued on August 17, 1998

All conditions from previous approvals were incorporated into this FESOP except the following:

- (a) S097-10042-00191, issued on August 17, 1998

All Conditions

Reason not incorporated: SSOA rules no longer apply.

- (b) F097-5265-0019, issued on January 25, 1996

All Conditions

Reason not incorporated: FESOP was not in effect at the time of this application.

Enforcement Issue

The source has the following enforcement actions pending:

On September 7, 2000, the source received a notice of violation for the following four (4) violations:

- (a) Violation of S097-10042-00191 Condition Number B.1 for not submitting the annual notice to ERMD, and;
- (b) Three (3) separate violations of S097-10042-00191 Condition Number A.1.(a) requiring that VOC emissions not exceed two (2) tons per month.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on June 19, 2000. Additional information was received on February 27, 2001.

Emission Calculations

See Page 8 of 8 in Appendix A of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	<100
PM-10	<100
SO ₂	<100
VOC	>100
CO	<100
NO _x	<100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Xylene	6.51
Toluene	2.54
Hexane	0.4
Methylene Chloride	7.58
TOTAL	18.13

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 100 tons per year, therefore the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1999 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.00
PM-10	0.00
SO ₂	0.00
VOC	17.92
CO	0.00
NO _x	0.00
HAP (none)	0.00

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

	Limited Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs	
							Methylene Chloride	Combined
EU2				<25(1)			1.38	3.18
EU9				<25(1)			1.79	3.32
All Printing Presses				<97.04(2)			7.58	10.20
Insignificant Activities	0.75	0.75		2.95				1.42
Total Emissions				<100(3)			7.58	18.13

- (1) So that each unit does not have emissions equal or greater than 25 tons per year so that 326 IAC 8-1-6 shall not apply, EU2 and EU9 are each limited to less than 25 tons of VOC usage per twelve (12) consecutive month rolling period.
- (2) So that the Source wide VOC emissions shall not be greater than or equal to 100 tons per year, emissions from all printing presses (EU2, EU3, EU5, EU6, EU9, and EU10) shall be limited to less than 97.04 tons of VOC usage per twelve (12) consecutive month rolling period.
- (3) So that the source-wide VOC emissions shall not be greater than or equal to 100 tons per year and the Part 70 Operating Permit Regulation 326 IAC 2-7-2 shall not apply, the sum of all significant emitting units (EU2, EU3, E5, EU6, EU8, and EU9) and all insignificant activities is limited to less than 100 tons per twelve (12) consecutive month rolling period.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO ₂	maintenance
NO _x	maintenance
Ozone	maintenance
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when

evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) Affected facilities subject to 40 CFR 60 Subpart QQ applicability are publication rotogravure printing presses. All units used by the source are either offset lithography, heatset lithography, nonheatset lithography, or letterpress printing presses. None of these presses use a gravure cylinder such as is defined in Subpart QQ, so none of the facilities are publication rotogravure printing presses. 40 CFR 60 Subpart QQ is not applicable to this source. No other Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) are applicable to this source.
- (b) An affected facility which falls under 40 CFR 63 Subpart KK applicability must meet the requirement of being a "new and existing facility that is a major source of hazardous air pollutant (HAP) as defined in 40 CFR 63.2." This is stated in 40 CFR 63.820. The source has PTE of less than 25 tons per year of total combined HAPs and less than 10 tons per year of total individual HAPs. It is not a major source of HAP as defined in 40 CFR 63.2, and therefore 40 CFR Subpart KK does not apply to the source. No other National Emissions Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 20 and 40 CFR 63) are applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-6-3 Malfunctions: Preventative Maintenance Plan

This rule is superseded by 326 IAC 2-8-3, but it shall contain the applicable provisions of 326 IAC 1-6-3.

326 IAC 2-6 Annual Emissions Statement

Because the potential emissions for the source exceeds 10 tons per year of VOC and the source is located in Marion county, the source is required to submit an annual emissions statement pursuant to 326 IAC 2-6. Pursuant to 326 IAC 2-6, the annual emission statement is due April 15th of each year.

326 IAC 2-8 FESOP Regulation

The source's potential to emit (PTE) before restrictions exceed the major source threshold for VOCs and HAPs established in 236 IAC 2-7-2, however the actual VOC and HAP emissions are below the major source thresholds. Therefore this source qualifies for the FESOP program. This source has accepted the following restrictions on PTE for VOCs and HAPs to stay below the major source thresholds.

This source is major for VOCs, consequently the emissions of VOCs from all from the six (6) presses and insignificant emitting activities are limited to less than 100 tons per rolling twelve month period such that 326 IAC 2-7 shall not apply. A value of 2.95 tons of VOCs per year, was calculated as the sum of all insignificant emitting activities, therefore compliance with this emissions limit is based on limiting the VOC input to the presses to less than 97.05 tons per rolling 12 month period.

326 IAC 5-1-2 Opacity Regulation

The opacity regulation applies as a generally applicable requirement.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 New Source Toxics Control

The new source toxics control rule does not apply since the source is not a major source of hazardous air pollutants (HAPs), as defined in 40 CFR 60.41.

326 IAC 6-3-2 Particulate Emission Limitations

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the use of

anti offset powders at the presses shall be limited by the following:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The process weight rate per hour of the use of anti offset powders is less than 100 lbs/hour, therefore the rate of emission is limited to 0.551 lbs/hour. The potential emissions from the use of anti offset powders is 4.16 lbs/day, which is 0.17 lbs/hour, much less than the established limit.

326 IAC 2-8-4(9) Preventative Maintenance Plan

A preventative maintenance plan is required to be maintained on-site for all lithographic presses, since a preventative maintenance plan is required under 326 IAC 2-8-3(c), and these lithographic presses are subject to a synthetic minor limit.

326 IAC 8-5-5 Graphic Arts Operations

None of the Lithographic Presses covered in this permit are subject to the Graphic Arts Regulation 326 IAC 8-5-5 since this regulation only applies to Flexographic and Rotogravure Presses. This rule corresponds to federal rule 40 CFR 60.440 (Subpart RR). The federal rule applies to pressure sensitive tape and label surface coating operations, and not to commercial printing operations where 100% of the substance is not covered.

326 IAC 8-1-6 New Facilities; General Reduction Requirements

The requirements of 326 IAC 8-1-6 are not applicable to any of the presses, since the facilities with PTE of greater than 25 tons per year for which 8-1-6 might apply if emissions were not limited, (EU2 and EU9), are limited to less than 25 tons of VOC's per rolling 12 month period so that 326 IAC 8-1-6 does not apply.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Compliance determination for all emitting units are based on record keeping and reporting requirements specified below:

The Permittee shall keep the following records to document compliance with the VOC emissions limitations:

- (a) The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used each month;
- (b) The VOC content (weight percent) of each material used each month;
- (c) The weight of VOCs emitted for each per month.

The Permittee shall submit a quarterly report which includes the following information;

- (a) Monthly and 12 month rolling sum of VOC usage for emitting units EU2 and EU9.
- (b) Monthly and 12 month rolling sum of VOC usage for all significant emitting units combined.

There are no compliance monitoring requirements applicable to these units. Compliance monitoring is not required because no NSPS or NESHAPs applies to the source, there are no controls on any of the permitted emission units, and there are no actual emissions from any emission unit exceeding 25 tons per year.

Conclusion

The operation of this stationary printing operation shall be subject to the conditions of the attached proposed FESOP F097-12399-0019.

Appendix A: Emission Calculations
Emission Summary

Company Name: Design Printing Company
Address City IN Zip: 626 North Illinois Street
F# F097-12399-00191
Plt ID: 191
Reviewer: Dana Armstrong
Date: 06-Jun-01

S/V ID	Emission ID	Description	Date Installed	Maximum Capacity		
				Feet/Min	Width	Mmin^2/hr
1	EU1	Heidelberg Printing Press CD 102 S&L	1989	390	40	11.232
1	EU2	Heidelberg Printing Press CD 102 S&L	1986	390	40	11.232
na	EU5	Heidelberg Printing Press SORSZ	1990	450	40	12.96
na	EU6	Heidelberg Printing Press GTOZ52+	1990	156	20	2.2464
1	EU8	Heidelberg SM74 6P&L	2000	458	29	9.56304
1	EU9	Heidelberg SM102 8P5+	2000	505	40	14.544

Appendix A: Emission Calculations
Heidelberg Printing Press CD 102 S&L

Company Name: Design Printing Company
Address City IN Zip: 626 North Illinois Street
F# F097-12399-00191
Plt ID: 191
Reviewer: Dana Armstrong
Date: 06-Jun-01

Throughput

Press ID	Impressions Per Hour	Maximum Sheet Length in Inches	Maximum Line Speed in Feet/Min	Convert Feet to Inches	Maximum Print Width Inches	60 Min/Hour	8760 Hours/Year	1/10^6	Throughput MMin^2/Year
Heidelberg Printing Press CD 102 S&L (EU1)	9,000.00	122.00	390.00	12.00	40.00	60.00	8,760.00	1.E-06	98,392.32

PTE for VOCs

Category Name (Compound with Highest VOC content)	Maximum Coverage lbs/MMin^2	Weight % Volatiles	% Retention	Throughput Mmin^2/year	2000 Lbs/Ton	Maximum % Operation	VOC Emissions Tons/Year
Toyo Inks	1.000	12.40%	95.00%	98,392.32	2,000.00	100.00%	0.31
Toyo Varnish	0.500	12.50%	0.00%	98,392.32	2,000.00	100.00%	3.07
Anchor ARS ML 2013	0.150	84.00%	0.00%	98,392.32	2,000.00	100.00%	6.20
HPS-369	0.250	100.00%	0.00%	98,392.32	2,000.00	100.00%	12.30
Ultra Glaze	0.070	60.00%	0.00%	98,392.32	2,000.00	100.00%	2.07
Total							23.94

PTE for HAPs

Specific Product Name	HAP or HAP Mixture Constituent	%Constituent	HAP in Constituent	%HAP in Constituent	%HAP in Product	% Retention	Maximum Coverage	Throughput Mmin^2/year	Maximum % Operations	HAP Emissions Tons/Year
HPS-369	Aromatic 100	51.79%	Xylene	7.00%	3.6253%	0.00%	0.60	98,392.32	100%	1.07010503
	Lacolene	36.04%	Toluene	7.00%	2.5228%	0.00%	0.07	98,392.32	100%	0.08687845
Ultra Glaze	Methylene Chloride	40.03%	Methylene Chloride	100%	40.0300%	0.00%	0.07	98,392.32	100%	1.3785256
	Xylene	7.54%	Xylene	100%	7.5400%	0.00%	0.07	98,392.32	100%	0.25965733
	Toluene	11.32%	Toluene	100%	11.3200%	0.00%	0.07	98,392.32	100%	0.38983037

Total Xylene 1.32976237
Total Toluene 0.47670882
Total MC 1.3785256
Total HAPs 3.18499679

Appendix A: Emission Calculations
Heidelberg Printing Press CD 102 S&L

Company Name: Design Printing Company
Address City IN Zip: 626 North Illinois Street
F# F097-12399-00191
Plt ID: 191
Reviewer: Dana Armstrong
Date: 06-Jun-01

Throughput

Press ID	Impressions Per Hour	Maximum Sheet Length in	Maximum Line Speed in Feet/Min	Convert Feet to Inches	Maximum Print Width Inches	60 Min/Hour	8760 Hours/Year	1/10^6	Throughput MMin^2/Year
Heidelberg Printing Press CD 102 S&L (EU2)	9,000.00	122.00	390.00	12.00	40.00	60.00	8,760.00	1.E-06	98,392.32

PTE for VOCs

Category Name (Compound with Highest VOC content)	Maximum Coverage lbs/MMin^2	Weight % Volatiles	% Retention	Throughput Mmin^2/year	2000 Lbs/Ton	Maximum % Operation	VOC Emissions Tons/Year
Toyo Inks	1.000	12.40%	95.00%	98,392.32	2,000.00	100.00%	0.31
Toyo Varnish	0.500	12.50%	0.00%	98,392.32	2,000.00	100.00%	3.07
Anchor ARS ML 2013	0.150	84.00%	0.00%	98,392.32	2,000.00	100.00%	6.20
HPS-369	0.250	100.00%	0.00%	98,392.32	2,000.00	100.00%	12.30
Ultra Glaze	0.070	60.00%	0.00%	98,392.32	2,000.00	100.00%	2.07
Total							23.94

PTE for HAPs

Specific Product Name	HAP or HAP Mixture Constituent	%Constituent	HAP in Constituent	%HAP in Constituent	%HAP in Product	% Retention	Maximum Coverage	Throughput Mmin^2/year	Maximum % Operations	HAP Emissions
HPS-369	Aromatic 100	51.79%	Xylene	7.00%	3.6253%	0.00%	0.60	98,392.32	100%	1.07011
	Lacolene	36.04%	Toluene	7.00%	2.5228%	0.00%	0.07	98,392.32	100%	0.08688
Ultra Glaze	Methylene Chloride	40.03%	Methylene Chloride	100%	40.0300%	0.00%	0.07	98,392.32	100%	1.37853
	Xylene	7.54%	Xylene	100%	7.5400%	0.00%	0.07	98,392.32	100%	0.25966
	Toluene	11.32%	Toluene	100%	11.3200%	0.00%	0.07	98,392.32	100%	0.38983

Total Xylene 1.32976
Total Toluene 0.47671
Total MC 1.37853
Total HAPs 3.185

Appendix A: Emission Calculations
Heidelberg Printing Press SORSZ

Company Name: Design Printing Company
Address City IN Zip: 626 North Illinois Street
F# F097-12399-00191
Plt ID: 191
Reviewer: Dana Armstrong
Date: 06-Jun-01

Throughput

Press ID	Impressions Per Hour	Maximum Sheet Length in Inches	Maximum Line Speed in Feet/Min	Convert Feet to Inches	Maximum Print Width Inches	60 Min/Hour	8760 Hours/Year	1/10^6	Throughput MMin^2/Year
Heidelberg Printing Press SORSZ (EU5)	9,000.00	122.00	450.00	12.00	40.00	60.00	8,760.00	1.E-06	113,529.60

PTE for VOCs

Category Name (Compound with Highest VOC content)	Maximum Coverage lbs/MMin^2	Weight % Volatiles	% Retention	Throughput Mmin^2/year	2000 Lbs/Ton	Maximum % Operation	VOC Emissions Tons/Year
Toyo Inks	1.000	12.40%	95.00%	113,529.60	2,000.00	100.00%	0.35
Toyo Varnish	0.500	12.50%	0.00%	113,529.60	2,000.00	100.00%	3.55
Anchor ARS ML 2013	0.150	84.00%	0.00%	113,529.60	2,000.00	100.00%	7.15
HPS-369	0.250	100.00%	0.00%	113,529.60	2,000.00	100.00%	14.19
Ultra Glaze	0.070	60.00%	0.00%	113,529.60	2,000.00	100.00%	2.38
Total							27.63

PTE for HAPs

Specific Product Name	HAP or HAP Mixture Constituent	%Constituent	HAP in Constituent	%HAP in Constituent	%HAP in Product	% Retention	Maximum Coverage	Throughput Mmin^2/year	Maximum % Operations	HAP Emissions Tons/Year
HPS-369	Aromatic 100	51.79%	Xylene	7.00%	3.6253%	0.00%	0.60	113,529.60	100%	1.23473658
Ultra Glaze	Lacolene	36.04%	Toluene	7.00%	2.5228%	0.00%	0.07	113,529.60	100%	0.10024437
	Methylene Chloride	40.03%	Chloride	100%	40.0300%	0.00%	0.07	113,529.60	100%	1.59060646
	Xylene	7.54%	Xylene	100%	7.5400%	0.00%	0.07	113,529.60	100%	0.29960461
	Toluene	11.32%	Toluene	100%	11.3200%	0.00%	0.07	113,529.60	100%	0.44980428

Total Xylene 1.53434119
Total Toluene 0.55004864
Total MC 1.59060646
Total HAPs 3.67499629

**Appendix A: Emission Calculations
Heidelberg Printing Press GTOZ52+**

Company Name: Design Printing Company
Address City IN Zip: 626 North Illinois Street
F# F097-12399-00191
Plt ID: 191
Reviewer: Dana Armstrong
Date: 06-Jun-01

Throughput

Press ID	Impressions Per Hour	Maximum Sheet Length in Inches	Maximum Line Speed in Feet/Min	Convert Feet to Inches	Maximum Print Width Inches	60 Min/Hour	8760 Hours/Year	1/10^6	Throughput MMin^2/Year
Heidelberg Printing Press GTOZ52+ (EU6)	9,000.00	122.00	156.00	12.00	20.00	60.00	8,760.00	1.E-06	19,678.46

PTE for VOCs

Category Name (Compound with Highest VOC content)	Maximum Coverage lbs/MMin^2	Weight % Volatiles	% Retention	Throughput Mmin^2/year	2000 Lbs/Ton	Maximum % Operation	VOC Emissions Tons/Year
Toyo Inks	1.000	12.40%	95.00%	19,678.46	2,000.00	100.00%	0.06
Toyo Varnish	0.000	12.50%	0.00%	19,678.46	2,000.00	100.00%	0.00
Anchor ARS ML 2013	0.150	84.00%	0.00%	19,678.46	2,000.00	100.00%	1.24
HPS-369	0.250	100.00%	0.00%	19,678.46	2,000.00	100.00%	2.46
Ultra Glaze	0.070	60.00%	0.00%	19,678.46	2,000.00	100.00%	0.41
Total							4.17

PTE for HAPs

Specific Product Name	HAP or HAP Mixture Constituent	%Constituent	HAP in Constituent	%HAP in Constituent	%HAP in Product	% Retention	Maximum Coverage	Throughput Mmin^2/year	Maximum % Operations	HAP Emission s
HPS-369	Aromatic 100	51.79%	Xylene	7.00%	3.6253%	0.00%	0.60	19,678.46	100%	0.214021
Ultra Glaze	Lacolene	36.04%	Toluene	7.00%	2.5228%	0.00%	0.07	19,678.46	100%	0.017376
	Methylene Chloride	40.03%	Methylene Chloride	100%	40.0300%	0.00%	0.07	19,678.46	100%	0.275705
	Xylene	7.54%	Xylene	100%	7.5400%	0.00%	0.07	19,678.46	100%	0.051931
	Toluene	11.32%	Toluene	100%	11.3200%	0.00%	0.07	19,678.46	100%	0.077966

Total Xylene 0.265952
Total Toluene 0.095342
Total MC 0.275705
Total HAPs 0.636999

Appendix A: Emission Calculations
Heidelberg SM74 6P&L

Company Name: Design Printing Company
Address City IN Zip: 626 North Illinois Street
F# F097-12399-00191

Plt ID: 191
Reviewer: Dana Armstrong
Date: 06-Jun-01

Throughput

Press ID	Impressions Per Hour	Maximum Sheet Length in	Maximum Line Speed in Feet/Min	Convert Feet to Inches	Maximum Print Width Inches	60 Min/Hour	8760 Hours/Year	1/10^6	Throughput MMin^2/Year
Heidelberg SM74 6P&L (EU8)	9,000.00	122.00	458.00	12.00	29.00	60.00	8,760.00	1.E-06	83,772.23

PTE for VOCs

Category Name (Compound with Highest VOC content)	Maximum Coverage lbs/MMin^2	Weight % Volatiles	% Retention	Throughput Mmin^2/year	2000 Lbs/Ton	Maximum % Operation	VOC Emissions Tons/Year
Toyo Inks	1.000	12.40%	95.00%	83,772.23	2,000.00	100.00%	0.26
Toyo Varnish	0.000	12.50%	0.00%	83,772.23	2,000.00	100.00%	0.00
Anchor ARS ML 2013	0.150	84.00%	0.00%	83,772.23	2,000.00	100.00%	5.28
HPS-369	0.250	100.00%	0.00%	83,772.23	2,000.00	100.00%	10.47
Ultra Glaze	0.070	60.00%	0.00%	83,772.23	2,000.00	100.00%	1.76
						Total	17.77

PTE for HAPs

Specific Product Name	HAP or HAP Mixture Constituent	%Constituent	HAP in Constituent	%HAP in Constituent	%HAP in Product	% Retention	Maximum Coverage	Throughput Mmin^2/year	Maximum % Operations	HAP Emission s
HPS-369	Aromatic 100	51.79%	Xylene	7.00%	3.6253%	0.00%	0.60	83,772.23	100%	0.911098
Ultra Glaze	Lacolene	36.04%	Toluene	7.00%	2.5228%	0.00%	0.07	83,772.23	100%	0.073969
	Methylene Chloride	40.03%	Methylene Chloride	100%	40.0300%	0.00%	0.07	83,772.23	100%	1.173691
	Xylene	7.54%	Xylene	100%	7.5400%	0.00%	0.07	83,772.23	100%	0.221075
	Toluene	11.32%	Toluene	100%	11.3200%	0.00%	0.07	83,772.23	100%	0.331906

Total Xylene 1.132173
Total Toluene 0.405875
Total MC 1.173691
Total HAPs 2.711739

Appendix A: Emission Calculations
Heidelberg SM102 8P5+

Company Name: Design Printing Company
Address City IN Zip: 626 North Illinois Street
F# F097-12399-00191
Plt ID: 191
Reviewer: Dana Armstrong
Date: 06-Jun-01

Throughput

Press ID	Impressions Per Hour	Maximum Sheet Length in	Maximum Line Speed in Feet/Min	Convert Feet to Inches	Maximum Print Width Inches	60 Min/Hour	8760 Hours/Year	1/10^6	Throughput MMin^2/Yea r
Heidelberg SM102 8P5+ (EU9)	9,000.00	122.00	505.00	12.00	40.00	60.00	8,760.00	1.E-06	127,405.44

PTE for VOCs

Category Name (Compound with Highest VOC content)	Maximum Coverage lbs/MMin^2	Weight % Volatiles	% Retention	Throughput Mmin^2/year	2000 Lbs/Ton	Maximum % Operation	VOC Emissions Tons/Year
Toyo Inks	1.000	12.40%	95.00%	127,405.44	2,000.00	100.00%	0.39
Toyo Varnish	0.000	12.50%	0.00%	127,405.44	2,000.00	100.00%	0.00
Anchor ARS ML 2013	0.150	84.00%	0.00%	127,405.44	2,000.00	100.00%	8.03
HPS-369	0.250	100.00%	0.00%	127,405.44	2,000.00	100.00%	15.93
Ultra Glaze	0.070	60.00%	0.00%	127,405.44	2,000.00	100.00%	2.68
Total							27.02

PTE for HAPs

Specific Product Name	HAP or HAP Mixture Constituent	%Constituent	HAP in Constituent	%HAP in Constituent	%HAP in Product	% Retention	Maximum Coverage	Throughput Mmin^2/year	Maximum % Operations	HAP Emissions Tons/Year
HPS-369	Aromatic 100	51.79%	Xylene	7.00%	3.6253%	0.00%	0.25	127,405.44	100%	0.5773537
Ultra Glaze	Lacolene	36.04%	Toluene	7.00%	2.5228%	0.00%	0.07	127,405.44	100%	0.1124965
	Methylene Chloride	40.03%	Methylene Chloride	100%	40.0300%	0.00%	0.07	127,405.44	100%	1.7850139
	Xylene	7.54%	Xylene	100%	7.5400%	0.00%	0.07	127,405.44	100%	0.336223
	Toluene	11.32%	Toluene	100%	11.3200%	0.00%	0.07	127,405.44	100%	0.5047804

Total Xylene 0.9135766
Total Toluene 0.6172768
Total MC 1.7850139
Total HAPs 3.3158674

Appendix A: Emission Calculations
Emission Summary

Company Name: Design Printing Company
Address City IN Zip: 626 North Illinois Street
F# F097-12399-00191
Plt ID: 191
Reviewer: Dana Armstrong
Date: 06-Jun-01

Potential To Emit of Significant Activities

Emission ID	Description	VOC	Xylene	Toluene	Methylene Chloride	Highest HAP	Combined HAPs
EU1	Heidelberg Printing Press CD 102 S&L	23.94	1.33	0.48	1.38	1.38	3.18
EU2	Heidelberg Printing Press CD 102 S&L	23.94	1.33	0.48	1.38	1.38	3.18
EU5	Heidelberg Printing Press SORSZ	27.63	1.53	0.55	1.59	1.59	3.67
EU6	Heidelberg Printing Press GTOZ52+	4.17	0.27	0.02	0.28	0.28	0.64
EU8	Heidelberg SM74 6P&L	17.77	1.13	0.41	1.17	1.17	2.71
EU9	Heidelberg SM102 8P5+	27.02	0.91	0.62	1.79	1.79	3.32
	Total	124.48	6.51	2.54	7.58	7.58	16.71
All HAPs							18.13

Potential To Emit of Insignificant Activities

Description	VOC	Hexane	HAPs	PM
Bindery Dept.	0.41			
Prepress Area	2.5404	0.4	1.02	
Anti Offset Powders				0.7592
Total	2.9504	0.4	1.02	0.7592

97.0496

Allowable VOC

7.98